

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GRIFOLS, S.A. and GRIFOLS SHARED  
SERVICES NORTH AMERICA, INC.,

Plaintiffs,

v.

DANIEL YU, an individual, GOTHAM CITY  
RESEARCH LLC, GENERAL INDUSTRIAL  
PARTNERS LLP, CYRUS DE WECK, an  
individual, JOHN DOES 1-10, and XYZ  
CORPORATIONS 1-10,

Defendants.

No.: 1:24-cv-00576-LJL

**STIPULATION AND ~~PROPOSED~~  
ORDER REGARDING BRIEFING  
SCHEDULE ON DEFENDANTS'  
MOTION TO DISMISS GRIFOLS'  
AMENDED COMPLAINT**

Plaintiffs Grifols, S.A. and Grifols Shared Services North America, Inc. (collectively, “Grifols”) and Defendants Daniel Yu, Gotham City Research, LLC, General Industrial Partners, LLP, and Cyrus De Weck (collectively, “Defendants”) (together, the “Parties”), through their undersigned counsel, hereby stipulate and agree, subject to the approval of the Court, to the following:

WHEREAS, pursuant to the Court’s July 1, 2024 Order (ECF No. 21), Grifols filed an Amended Complaint on September 9, 2024 (ECF No. 22);

WHEREAS, pursuant to the Court’s July 1, 2024 Order, the parties met and conferred and agreed to the below briefing schedule concerning Defendants’ anticipated Motion to Dismiss Grifols’ Amended Complaint;

IT IS THEREFORE, HEREBY STIPULATED AND AGREED by and between the Parties,  
that:

1. The following briefing schedule will apply to Defendants' anticipated Motion to Dismiss Grifols' Amended Complaint:

Event	Deadline
Defendants' Opening Brief	October 22, 2024
Grifols' Opposition Brief	December 9, 2024
Defendants' Reply Brief	December 20, 2024

2. The Parties shall serve any of the aforementioned briefing on one another on or before the applicable deadlines and then file the briefing with the Court upon service of Defendants' Reply Brief.

**IT IS SO STIPULATED.**

Dated: September 24, 2024

Respectfully submitted,

**PROSKAUER ROSE LLP**

/s/ Peter D. Doyle

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Shared Services North  
America, Inc.*

**MILLER KORZENIK  
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*Counsel for Defendants  
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Research LLC, General  
Industrial Partners, LLP and  
Cyrus de Weck.*

**DATED:** September 24, 2024

**SO ORDERED:**



Hon. Lewis J. Liman, U.S.D.J.